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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 11/13/2019

November 8, 2019

Via ECF:

Hon. Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: **Jasmine Norman v. NYU Langone Health System**
Docket No.: 19-CV-00067 (AT)

Your Honor:

This office represents Plaintiff in the above referenced matter. Plaintiff writes to respectfully request the Court stay or hold in abeyance the completion of expert discovery pending resolution of summary judgment motion practice. Defense counsel consents to this request. This is Plaintiff's first request to stay/hold expert discovery in abeyance pending resolution of summary judgment. Plaintiff further respectfully requests a short expert discovery period following the conclusion of summary judgment motion practice.

By way of background, Plaintiff alleges Defendants violated federal, state, and local disability discrimination laws in the form of failure to provide reasonable accommodations. On October 29, 2019, Defendants a letter motion seeking leave to file a summary judgment motion. On November 5, 2019, Plaintiff filed her letter response. Expert discovery is set to close on November 25, 2019.

The reason for the request is that Defendants are not relying on their expert report in support of their summary judgment motion. Plaintiff would incur significant costs retaining a rebuttal expert, and deposing Defendant's expert now, which may be wasteful depending on what transpires during motion practice. As such, in an effort to keep the costs down which Plaintiff incurs, Plaintiff respectfully requests that expert discovery be stayed or held in abeyance pending a resolution of summary judgment practice. To the extent the Court declines to set a briefing schedule or should the Court deny Defendant's motion, Plaintiff respectfully requests a short expert discovery period following the conclusion of summary judgment.

Plaintiff thanks the Court for its time and consideration of the herein requests.

Respectfully,
PHILLIPS & ASSOCIATES

/s/
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DENIED. The Court will not stay discovery pending its decision on any motion.

SO ORDERED.

Dated: November 13, 2019
New York, New York


ANALISA TORRES
United States District Judge